Torres, Francine

From: michel@theorganicwinecompany.com%inter2 [michel@theorganicwinecompany.com] on

behalf of michel@theorganicwinecompany.com

Sent: Tuesday, August 16, 2005 4:13 PM

To: National List

Subject: FW: Sunsetting of Sulfur Dioxide on National List

Attachments: ATTACHMENT.TXT

Mr. Arthur Neal Program Administration USDA National Organic Program Washington, DC

Dear Mr Neal:

I am writing to express the opinion of The Organic Wine Company as regards the continued use of Sulfur Dioxide in wines made from organic grapes. The Organic Wine Company was the first company to import and distribute such wines in the US 25 years ago. I have been personally in charge of the management of our family winery in France for many years. As such I have a direct experience of making wines from the ground up. Moreover, as a physician, I have always sought to reduce to a minimum the use of sulfur dioxide in my wines. Our property was among the pioneers of the organic movement more than 30 years ago.

On the other hand, as a wine consultant in charge of selecting wines for importation, I have been in touch with numerous wineries and winemakers, all grappling with the same desire to reduce this preservative.

In spite of all attempts in that direction it is nevertheless clear that Sulfur dioxide has remained to this day the only viable and reliable way to ensure a lasting quality to any wine, notwithstanding the techniques used to grow the grapes. Apart from a handful of wineries who can justify taking the risk to make wines without added sulfites by their small production or the control they have over the distribution (with the consequence of a much higher cost to the consumer) the vast majority of the organic winemakers will keep using for the predictable future the same low dosages of added sulfites to make sure their products are representative of their efforts and have not lost their essential qualities before they arrive in the consumer's glass.

There is no reasonable alternative at the present time to the continued use of sulfur dioxide in winemaking around the globe. Everybody will be glad to adopt another technique or product, if better in any way, when it shows up and we are encouraging all winemakers to keep experimenting. In the meantime however, we wholeheartedly support the renewal of the inscription of sulfur dioxide on the NOP National List of allowed ingredients for the processing of wines made with organic grapes.

Michel Ginoulhac, M.D. Wine Selection The Organic Wine Company San Francisco, Ca

415-256-8888

michel @theorganic wine company.com